

EXHIBIT A

From: [Kaiser, Steven J.](#)
To: [Robert Falanga](#)
Cc: [Riccio, Nicole](#); [Garrison, Grady](#); pcoggins@lockelord.com; bgaffney@lockelord.com; [Kobelah Bennah](#); [Haynes, Savannah](#)
Subject: RE: Deposition dates
Date: Friday, April 8, 2022 9:41:19 AM
Attachments: [image001.png](#)

Robert,

All Defendants could do the following schedule:

Hallmark or Weber on May 9

Other of Hallmark of Weber on May 11

Defendants accept the 10th for Haygood and 17th for Owens.

We will also be issuing 30(b)(6) notices, which we hope can be accomplished the same days for the respective organizations.

Let us know about the 9th and 11th for Hallmark and Weber.

Steven J. Kaiser

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From: Robert Falanga <Robert@FalangaLaw.com>

Sent: Friday, April 1, 2022 6:19 PM

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Subject: Deposition dates

Steven:

I have gotten with my clients and I have the following deposition dates for you. You said that we need to get these done during the first three weeks of May so I have scheduled the following:

Ashley Haygood-May 10th

Craig Hallmark-May 12th

Heidi Weber- May 13th

David Owens-May 17th

My schedule for those first three weeks of May are a nightmare so these are the best that I could do within the three week period that you asked for these to be scheduled.

On another note, we have received additional documents from Mr. Owens and are going through those now with the RICOH people. We hope to get those to you the first part of next week.

Thanks

Robert Falanga



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